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March 6, 2022

BY ECF:

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: United States v. Min Chen, et al
Case No.: 1:22-CR-00125 (AT)
Letter Motion Seeking Modification of Release Conditions

Dear Judge Torres:

Please be advised I represent **Min Chen** in the above captioned action.

Mr. Chen is currently subject to release conditions as per the March 29, 2022 order (ECF No.: 13), as modified by subsequent order (ECF No.: 36). Mr. Chen is subject to a location restriction, home incarceration with location monitoring, as part of his conditions of release. We respectfully submit this letter requesting a modification of Mr. Chen's release conditions.

Mr. Chen was offered full-time employment with Seasonfresh Supermarket (2046 Lakeville Rd, New Hyde Park, NY 11040) as packing staff with the meat department. Mr. Chen has been offered the role with a start date of March 8, 2023, scheduled for 8:30 AM - 4:00 PM from Tuesday-Sunday each week, and a salary of \$52,000 per year.

I submit this letter to respectfully request modification of Mr. Chen's release conditions from home detention to a curfew with location monitoring as directed by pretrial services and travel restricted to the Southern District of New York. All other restrictions on Mr. Chen will remain in place.

I have spoken with AUSA Cecilia Vogel regarding this request and her office has no objection to the requested modification to a curfew with location monitoring. I have also spoken with USPO Jonathan Lettieri and Pretrial Services has no objection to the requested modification to a curfew with location monitoring.

If Your Honor has any questions, or concerns, I am available to address them. Please feel free to reach out to me by email, at ts@spodeklawgroup.com, or by phone at 347-292-8633.

The Honorable Analisa Torres
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Thank you in advance for your attention to this matter.

Sincerely,

Spodek Law Group P.C.

/s/ Todd A. Spodek

Todd A. Spodek

cc: AUSA Cecilia Vogel (By ECF).
USPO Jonathan Lettieri (By Email).
USPO Amanda Sanchez (By Email).

GRANTED.

SO ORDERED.

Dated: March 7, 2023
New York, New York



ANALISA TORRES
United States District Judge